

Boise Cascade Corporation

Public Policy & Environment

EPA's Multi-sector stormwater permit (MSGP) recognizes certain non-stormwater discharges from industrial facilities that have little potential to contribute to a violation of an applicable water quality standard. EPA recognizes these discharges as non stormwater, however, authorizes its discharge under the permit. The discharges identified by EPA include:

"...discharges from fire fighting activities; fire hydrant flushings; potable water sources; including waterline flushings; irrigation drainage; lawn watering; routine external building wash down without detergents; pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used; air conditioning condensate; compressor condensate; uncontaminated groundwater or spring water; and foundation or footing drains where flows are not contaminated with process materials solvent that are combined with stormwater discharges associated with industrial activity."

The fact sheet associated with Washington DOE's 2000 General Stormwater Permit explicitly states that discharges of the nature identified by EPA are not authorized under the permit. However, the discharges should be assessed and if they contain pollutants that commingle with stormwater, then appropriate BMPs should be applied and Ecology should be contacted regarding the need for a separate permit. Generally, Ecology has refrained from issuing separate permits for discharges such as these into the stormwater system. This has left industry covered by the permit with incidental non stormwater discharges that are prohibited from entering the stormwater system and no practical alternative for lawful disposal.

The 2002 draft Industrial Stormwater General Permit does not provide any additional clarification as to Ecology's position on these incidental non-stormwater discharges. The recently published Stormwater Manual for Western Washington, Volume IV suggests best management practices for some of these discharges including BMPs for Landscaping and Lawn/Vegetation Management. This suggests that Ecology recognizes the likelihood of these incidental discharges and allows them to be discharged with stormwater.

We request the permit specifically identify these incidental sources of non-stormwater and authorize its discharge in the permit.